

TAG Comments on the 2011 Sitewide Five-Year Review Report

**Motorola 52nd Street
Superfund Site
Phoenix, Arizona**

Presented By:
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TALK OVERVIEW

- Documents Reviewed
 - 2011 Sitewide Five-Year Review Report
 - Includes both OU1 & OU2
- Positive Steps Forward with Sitewide Review
- OU1 Vapor Intrusion Work Plan
- Questions Provided by the Community

DOCUMENTS REVIEWED

- 2011 Sitewide Five-Year Review Report (OU1 & OU2)
 - Cited as (2011 FYR)
- Third Five-Year Review Report for Operable Unit 1, Motorola 52nd Street Superfund Site, Phoenix, Arizona
 - Cited as (2006 FYR)
- M52, OU1, Third Five Year Review Addendum Report—OU1 Groundwater Treatment Facility
 - (2006 FYR Add.)
- Prioritization and Selection of Buildings for a Phase 2 Soil Gas-to-Indoor Air Vapor Intrusion Assessment, Honeywell 34th Street Facility, Phoenix, Arizona
 - Cited as (HW VI Memo)
- Comprehensive Five-Year Review Guidance, *OSWER No. 9355.7-03B-P*
 - Cited as (Guidance)

PUBLIC COMMENT PERIOD ON FIVE YEAR ASSESSMENT

- “Depending on the nature of the site and the interest in the community, another option for involving the public is to provide a public comment period on the findings of the five-year review.” (Guidance, Appendix A, page A-4)
- *TAG Comment:* TAG believes that there is a community interested in a public comment period on the next comprehensive Five-Year Review and would like to see this scheduled into the next five-year review process.

PUBLICATION OF PRIVATE INFORMATION

- *TAG Comment:* The community is concerned about the publication of personal information in the appendices of the 2011 FYR.
- *TAG Question:* What was the rationale for the change made from 2006 to 2011 to disclose additional personal information? What are EPA's guidelines about disclosing home addresses, phone numbers, e-mail addresses for community residents?
- *TAG Question:* For future five-year reviews, is there a way for community members to be interviewed but withhold personal information?

FLUCTUATIONS IN AGENCY OVERSIGHT BUDGET—OU1

Table 4-1 O&M Costs for OU1

Year	Utilities*	Materials/Supplies	Disposal/Regeneration	Operation**/Monitoring/Reporting	Other Expenses***	Agency Oversight	Annual Total (Excluding Agency Oversight)	Cost Per Million Gallons of Extracted Groundwater Treated [†]	Cost Per Pound of TCE Removed [†]
2006	\$378,342	Included in Operating Costs	\$51,739	\$370,976	\$404,554	\$254,345	\$1,205,611	\$5,520/Mgal	\$713/lb
2007	\$381,219	Included in Operating Costs	\$61,578	\$397,877	\$369,058	\$180,509	\$1,209,732	\$6,140/Mgal	\$937/lb
2008	\$386,336	Included in Operating Costs	\$69,500	\$430,599	\$429,691	\$71,612	\$1,316,126	\$6,930/Mgal	\$1,470/lb
2009	\$383,385	Included in Operating Costs	\$15,745	\$446,041	\$449,680	\$26,436	\$1,294,851	\$6,870/Mgal	\$1,710/lb
2010 ^{††}	\$382,800	Included in Operating Costs	\$31,490	\$450,000	\$445,970	\$144,481	\$1,310,260	Not Available	Not Available
Average	\$382,416	---	\$46,010	\$419,099	\$419,791	\$135,477	\$1,267,316	\$6,370/Mgal	\$1,210/lb

Notes:

* Excludes water discharge costs.

** Maintenance and repairs are included in this item.

*** Includes well installation/abandonment, additional technical support/reports to agencies, permit/access fees, additional studies, new sewer connection, etc.

[†] Based on annual quantities presented in Effectiveness Reports and Utilities, Materials/Supplies, Disposal/Regeneration, and Operation/Monitoring/Reporting costs only.

^{††} Includes projected costs (compiled in November 2010).

Mgal million gallons

TCE trichloroethene

lb pound

Source of cost data:

Freescall Semiconductor, Inc.

- **TAG Question:** Is there an explanation for the 10-fold decrease in the Agency Oversight O&M Cost?

SOIL ASSESSMENT OF THE ACID TREATMENT PLANT (ATP)—OU1

- The Acid Treatment Plant (ATP) has been mentioned as a contaminated area in since initial site investigations in 1983.
- However, “No soil cleanup or soil gas investigation of the ATP area has been conducted to date.” (2011 FYR, page ES-2)
 - Lack of evaluation affects both Current and Future protectiveness (2011 FYR, page ES-4, Issue 5)
- 2011 FYR: “A work plan should be developed for establishing clean-up criteria at the ATP. The criteria will be established once the Soil Rule and guidance is finalized and should be included in the work plan.” (2011 FYR, page 36, Issue 9)

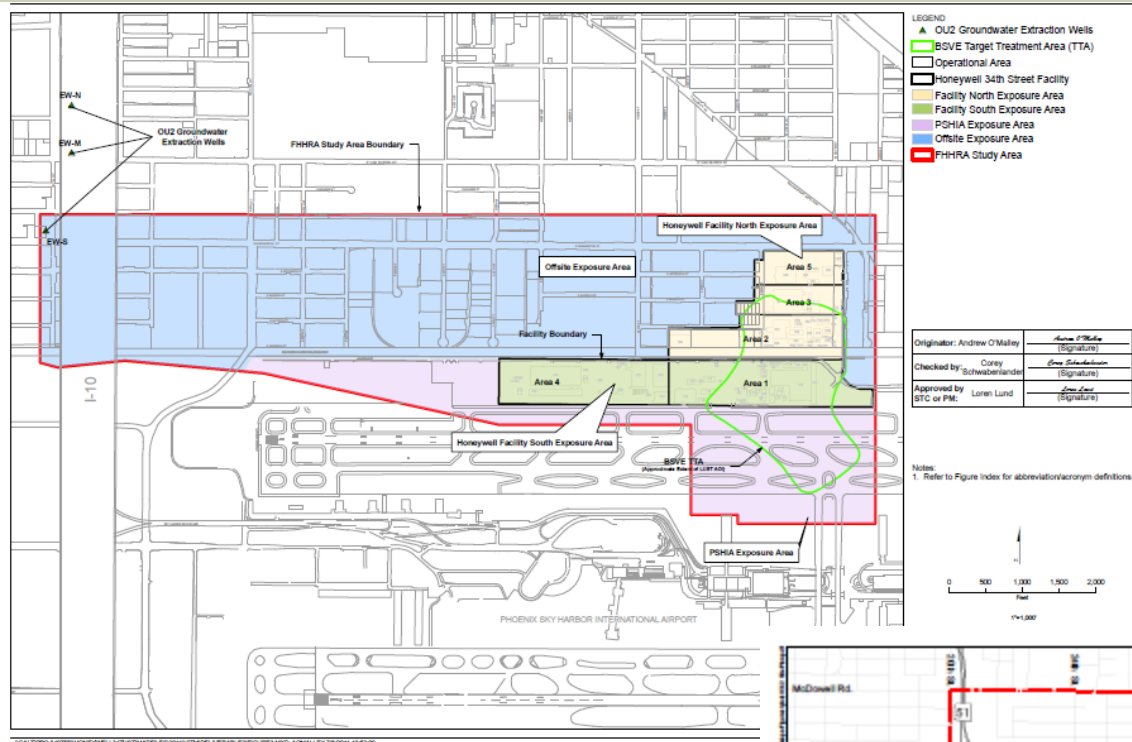
ASSESSMENT OF THE ACID TREATMENT PLANT (ATP)—OU1

- What does the 2006 OU1 FYR Addendum say about the completion of the ATP area work plan?
 - Completion Date: “1 year following promulgation of Soil Rule and Guidance.” (2006 FYR Add., § 5, Issue #9)
- Has a Soil Rule and Guidance been promulgated?
 - Soil Rule and Guidance issued 5 May 2007.
- Yet, 2011 FYR lists completion of the ATP work plan as ‘ongoing’ (2011 FYR, page 36, Issue #9).
- *TAG Question:* When can we expect ATP area soil remediation to commence?

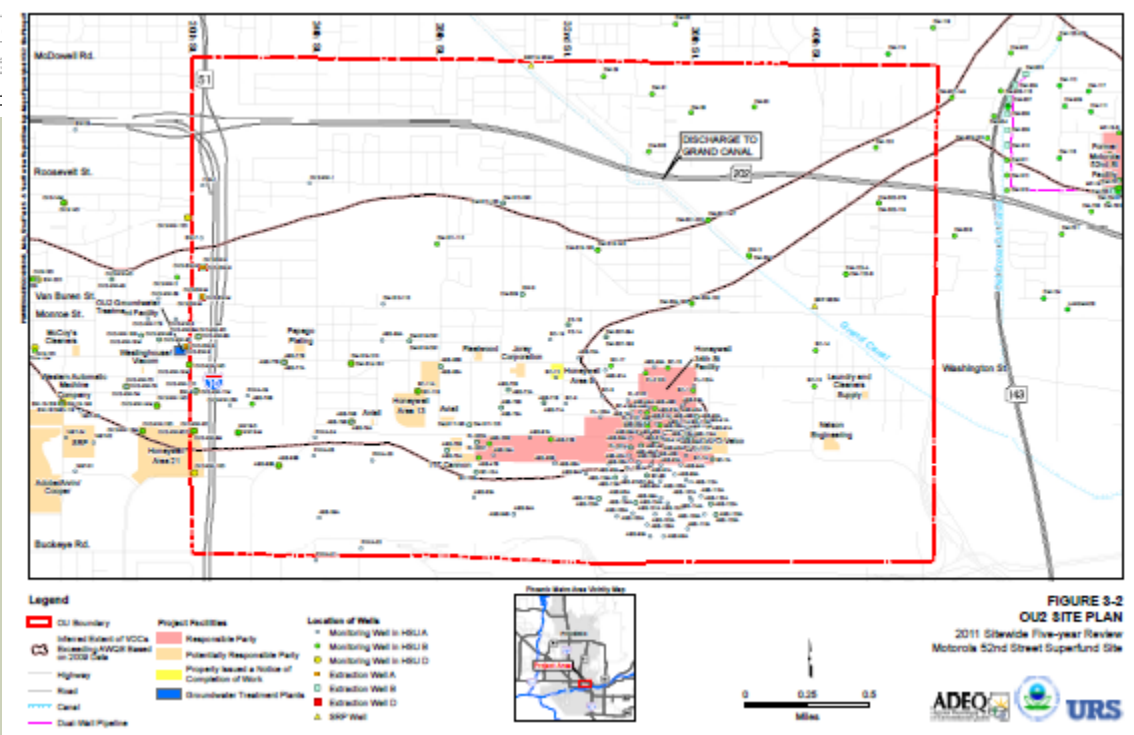
VAPOR INTRUSION ASSESSMENT IN OU2

- “Given current developments in the evaluation of vapor intrusion to indoor air, the lack of a comprehensive framework for the assessment of the vapor intrusion to indoor air pathway in OU2 remains an issue.” (2011 FYR, page 75)
- *TAG Comment:* It is understood that investigating and mitigating vapor intrusion will be part of the OU2 RI/FS, but it is not clear what part of OU2 will be addressed in these studies.
- *TAG Question:* Will the OU2 vapor intrusion investigation encompass the extent of the groundwater plume in OU2 or be constrained to the ‘Offsite’ area denoted in the Honeywell vapor intrusion work plan?

Source: (HW VI Memo; Figure 3)



Source: (2011 FYR, Figure 3-2)



BENEFICIAL END USE FOR IGWTP EFFLUENT WATER—OU1

- “Select a demonstrated beneficial end use for groundwater treated at the IGWTP and implement a decision document modifying the end use defined in the ROD/LOD.”
(2011 FYR, page ES-5)
- “Where increased groundwater extraction could potentially promote increased containment of contamination, take measures to increase groundwater extraction.”
(2011 FYR, page ES-5)
- *TAG Comment:* These two comments are listed in succession multiple times throughout the report and additional studies need to be undertaken to re-evaluate reinjection at OU1.

THIRD FIVE-YEAR ASSESSMENT (OU1): GENERAL FOLLOW UP ACTION #20

- “ADEQ will conduct a PRP search for upgradient sources and will evaluate whether these sources will impact the remedy.” (2006 FYR, page 57)
 - Table 8 from 2006 Third Five-Year Review sets a completion date of 9/28/2007
 - Current status change to ‘ongoing’ in 2006 Third-Five Year Review addendum and having unknown impact on future site protectiveness (2006 FYR Add., § 5, Issue #20)
- Current status: 2011 FYR has an ‘ongoing’ completion date (2011 FYR, page 38, Issue #20)

THIRD FIVE-YEAR ASSESSMENT (OU1): GENERAL FOLLOW UP ACTION #20

- *TAG Comment:* While we recognize a newly identified upgradient source may not impact the remedy, it may impact size of OU1 and the northern extent of the contaminated groundwater plume.
 - The highest concentrations of TCE in soil gas were to the east of the OCC.

- *TAG Question:* What is the reason for the discrepancy between completion dates for Issue #20? When can the public expect a statement or report regarding Issue #20?
 - (2006 FYR, page 57)

RISING WATER TABLE IN OU2

- “Pumping of OU2 extraction wells has also contributed to localized decreases in groundwater elevations. However, recent data indicates a slight increasing trend in the OU2 area in 2009 likely due to extended releases of water into the Salt River.”
(2011 FYR, page 55)

- *TAG Question:* Due to the increase in the water table, should we expect to see a decreased efficiency of the BSVE system in OU2?
 - Will this create conditions favoring off-site transport?
 - If so, how much and what steps are being done to mitigate?

INCLUSION OF OU3 INTO FIVE-YEAR REVIEWS

- *TAG Comment:* While remedial activities in OU3 have yet to commence, the community would still like to see the inclusion of OU3 into the Five-year review. There is a public interested in seeing data regarding what studies have been completed and milestone dates for OU3.
- *TAG Question:* Should expect to see OU3 included in upcoming Five-Year Review?

POSITIVE STEPS IN 2011 FIVE-YEAR REVIEW

- Use of milestone dates
- Integration of OU1 and OU2 Five-Year Reviews
 - *Comment:* More readable layout?
- *TAG Question:* Is there a specific policy or statutory reason for the integration of OUs?

OU1 VAPOR INTRUSION WORK PLAN

- *TAG Comment:* The OU1 Vapor Intrusion Work Plan needs to place a greater emphasis on cataloguing the conditions of the homes sampled. Just requiring the sample technician to inquire about the ventilation system, if possible, is not enough. The state of the home should be catalogued in detail to provide additional explanatory information about indoor air quality so as to help individualized remedies if necessary.
- *TAG Question:* If a resident is concerned about the potential for vapor intrusion, especially after last night's newscast on KPHO, what precautions should they take and who should they contact?

QUESTIONS PROVIDED BY COMMUNITY

(1/2)

- When can we expect to see reports on activities taking place in OU3?
- How much pollution is estimated to be at OU2?
- What is the expected completion date of remedial activities at OU1?
- How do treatment costs compares to what was expected?
- Will there be winter indoor air sampling in OU1?
- When will expect more indoor air sampling in OU1?

QUESTIONS PROVIDED BY COMMUNITY

(2/2)

- Who do I contact to ask question about subsidence in the OU1 area?
- What constitutes a 'not applicable' answer in the community interview logs?
- Is my home address and phone number listed in the interview logs? Is that allowed?
- Do we lose out on information by having the 5-year review combined into one assessment?

CONCLUDING REMARKS

- We like the Sitewide Review format, but would like to see format improvements—separate OU1 and OU2 sections—for the next Five-Year Review Report.

More Importantly:

- The TAG wants to see a public comment period scheduled for the next five-year review assessments.
- The TAG wants to see a more careful handling of the private information of community members.

CONTACT

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- KPHO News Segment:
<http://www.kpho.com/story/16593718/toxic-chemicals-discovered-in-phoenix-neighborhood?autoStart=true&topVideoCatNo=default&clipId=6672065>

UNIDENTIFIED SOURCES IN OU2

- “In OU2, future protectiveness may be impacted by a long-term issue with capture in an area southeast of the OU2 extraction system; there is contamination upgradient of this system that [...] is expected to travel along a flow path outside the current limit of capture” (2011 FYR, page ES-8).
- *TAG Comment:* Is this upgradient source Honeywell-related or from an unidentified PRP?

COMBINATION OF OUS IN FIVE-YEAR ASSESSMENT

- “Regions may choose to combine the separate reviews of different areas into a single five-year review prior to, or following, construction completion for the entire site.”
(Guidance; page 1-6)
- *TAG Comment:* OU1 and OU2 were treated separately in the 2006 round of Five-Year reviews. In 2011, OU1 and OU2 were combined into one review. What was the motivation behind this change?